

1 MARC J. ZILVERSMIT, ESQ., State Bar No. 132057
2 523 Octavia Street
3 San Francisco, CA 94102
4 Telephone: (415) 431-3472

5
6
7 Attorney for Defendant
8 STEVE MCINTOSH

9
10
11
12
13
14
15
16

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

17 UNITED STATES OF AMERICA,) CR 14-00016 MMC
18 Plaintiff,)
19 vs.)
20 MARLIN MOORE, STEVE MCINTOSH,)
21 MARK GOLDBERG, SON DANG)
22 Defendants.)
23

24
25
26
27
28

**STIPULATION TO RESCHEDULE
STATUS CONFERENCE DATE;
[proposed] ORDER**

It is hereby stipulated by and between United States and Defendants Steve McIntosh, Marlin Moore, Mark Goldberg and Son Dang through their respective counsel, that the status hearing date set for September 17, 2014 at 2:15 pm be continued and set for December 10, 2014 at 2:15 pm, or other convenient date set by this Court for the hearing.

Good cause exists for this continuance because the government has provided defense counsel with voluminous discovery which will require time to review for effective preparation and because discovery production is ongoing.

Good cause exists to exclude time under the Speedy Trial Act pursuant to 18 U. S.C., § 3161(h)(7)(A) and (h)(B)(iv) as the ends of justice served by this exclusion allowing for continuity of counsel, ongoing discovery production and review, and for adequate trial preparation in this matter outweigh the best interest of the public and the defendant in a speedy trial.

1 Dated: September 9, 2014

Respectfully stipulated and submitted,

2 /s/

/s/

4 PHILIP KENT COHEN
5 Attorney for Defendant
6 MARLIN MOORE

MARC J. ZILVERSMIT
Attorney for Defendant
STEVE MCINTOSH

7 /s/

/s/

8 RANDY SUE POLLOCK
9 Attorney for Defendant
10 MARK GOLDBERG

GALIA AMRAM PHILLIPS
Attorney for Defendant
SON DANG

12 /s/

14 DAMALI TAYLOR
15 Assistant United States Attorney

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19
20 Dated: September 12, 2014


21 MAXINE M. CHESNEY
22 UNITED STATES DISTRICT JUDGE